

1 TERRI KEYSER-COOPER  
Law Office of Terri Keyser-Cooper  
2 NV Bar #3984  
2395 Viejo Place, Lake Havasu City, AZ 86406  
3 125 Edgewater Parkway, Reno, NV 89519  
Tele (775) 337-0323  
4 keysercooper@lawyer.com  
*Attorney for Plaintiff Johnson*  
5  
6

7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 HIRAM JOHNSON,  
10  
11 Plaintiff,

Case No. 3:21-cv-00441-LRH-CLB

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR FILING  
OF THE CASE MANAGEMENT REPORT**

12  
13 v.

(First Request)

14 DAL GLOBAL SERVICES, LLC,  
15 aka DELTA GLOBAL SERVICES,  
16 Defendant.  
17 \_\_\_\_\_ /

18 Pursuant to LR 7-1, Plaintiff, by and through his counsel of record, Terri Keyser-Cooper, of the  
19 Law Office of Terri Keyser-Cooper, and Defendant, by and through its counsel of record, Ethan D.  
20 Thomas, of Littler Mendelson P.C., hereby stipulate and request that this Court extend the deadline for  
21 filing the Case Management Report presently due on January 4, 2022 by thirty (30) days, up to and  
22 including February 4, 2022. In support of this stipulation and request, the parties state as follows:

23  
24 Plaintiff's counsel is going out of the country on December 1 and returning on December 13,  
25 2021. On December 28, 2021, Plaintiff's counsel is also having surgery. Ms. Keyser-Cooper's doctors  
26 have informed her she will require, at minimum, ten days of recovery after the surgery during which  
27 time she should not be sitting at her desk or in front of a computer. Also, the parties have been  
28

1 informed that an Early Neutral Evaluation (“ENE”) will be set for some time in the near future. If the  
2 case were to resolve at the ENE it would necessarily obviate the need for a Case Management  
3 Conference or Report.

4 This request for an extension of time is not sought for any improper purpose or for purposes of  
5 unnecessary delay.

6 WHEREFORE, the parties respectfully request that this Court extend the date for the filing of  
7 the Case Management Report up to and including February 4, 2022.

8 IT IS SO STIPULATED this 23 day of November, 2021.

9 LITTLER MENDELSON P.C.

10 TERRI KEYSER-COOPER

11 By /s/ Ethan D. Thomas  
12 Ethan D. Thomas  
13 3660 Howard Hughes Parkway, Suite 300  
14 Las Vegas, Nevada 89169  
Attorney for Defendant

By /s/ Terri Keyser-Cooper  
Terri Keyser-Cooper  
2395 Viejo Place  
Lake Havasu City, AZ  
86406  
Attorney for Plaintiff

15  
16  
17 **ORDER**

18  
19 IT IS SO ORDERED this 23rd day of November, 2021.

20  
21   
22 UNITED STATES MAGISTRATE JUDGE  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28